1	GIA N. MARINA Nevada Bar No. 15276	
2	CLARK HILL PLLC 1700 South Pavilion Center Drive, Suite 500 Las Vegas, Nevada 89135 E-mail: gmarina@clarkhill.com Telephone: (702) 862-8300	
3		
4		
5	Facsimile: (702) 778-9709 Attorney for Defendant	
6	National Consumer Telecom & Utilities Exchange, Inc.	
7		
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
9	PATRICK ATKINSON,	Case No. 2:24-cv-01580-JCM-EJY
10	ŕ	
11	Plaintiff,	TOTAL MOTION FOR ENTENCION OF
12	VS.	JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT NATIONAL
13	NATIONAL CONSUMER TELECOM &	CONSUMER TELECOM & UTILITIES EXCHANGE, INC. TO FILE ANSWER
14	UTILITIES EXCHANGE, INC. and CLARITY SERVICES, INC.,	
15	Defendants.	FIRST REQUEST
16	Defendants.	
17	Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has	
18	requested an extension of time to answer, move or otherwise respond to the Complaint in this	
19	matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY	
20	STIPULATED AND AGREED to by and among counsel, that NCTUE's time to answer, move or	
21	otherwise respond to the Complaint in this action is extended from September 27, 2024 through	
22	and including October 28, 2024. The request was made by NCTUE so that it can have an	
23	//	
24	//	
25	//	
26		
27		
28		

Case 2:24-cv-01580-JCM-EJY Document 6 Filed 09/26/24 Page 2 of 2

1 opportunity to collect and review its internal files pertaining to the allegations in the Complaint, 2 and Plaintiff approves. This stipulation is filed in good faith and not intended to cause delay. 3 Respectfully submitted, this 25th day of September, 2024. 4 5 CLARK HILL PLLC No opposition /s/ Gerardo Avalos 6 By: /s/Gia N. Marina George Haines, Esq. Gia N, Marina Nevada Bar No. 9411 7 1700 South Pavilion Center Drive, Suite 500 Gerardo Avalos Las Vegas, Nevada 89135 Nevada Bar No. 15171 8 Telephone: (702) 862-8300 FREEDOM LAW GROUP Facsimile: (702) 778-9709 9 8985 S. Eastern Ave., Suite 350 Email: gmarina@clarkhill.com Henderson, NV 89123 Attorney for Defendant National Consumer 10 Phone: (702) 880-5554 *Telecom & Utilities Exchange, Inc.* Fax: (702) 385-5518 11 Email: ghaines@freedomlegalteam.com Email: gavalos@freedomlegalteam.com 12 13 Attorneys for Plaintiff 14 15 IT IS SO ORDERED: 16 17 18 19 DATED: September 26, 2024 20 21 22 23 24 25 26 27 28